

Exhibit

“A”

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
CASE NO. 2:23-cv-00332-KSM

- - -

FRATERNAL ORDER OF POLICE	:	
PENNSYLVANIA LODGE, SPRINGFIELD	:	
TOWNSHIP POLICE BENEVOLENT	:	
ASSOCIATION, CHRISTIAN WILBUR,	:	
ROBERT BAIADA, and CHRIS	:	
CALHOUN,	:	DEPOSITION UNDER
	:	
Plaintiffs,	:	
- vs -	:	ORAL EXAMINATION
	:	
TOWNSHIP OF SPRINGFIELD, JAMES	:	OF
LEE, in his official capacity,	:	
BAIRD M. STANDISH, in his	:	CHRISTIAN WILBUR
official capacity, MICHAEL E.	:	
MAXWELL, in his official	:	
capacity, SUSANNA O. RATSAVONG,	:	
in her official capacity, PETER	:	
D. WILSON, in his official	:	
capacity, JONATHAN C. COBB, in	:	
his official capacity, EDDIE T.	:	
GRAHAM, in his official	:	
capacity, and A. MICHAEL TAYLOR	:	
in his official capacity,	:	
	:	
Defendants.	:	

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TRANSCRIPT OF DEPOSITION, taken by and
before JAMES HOPPER, a Registered Professional
Reporter and Notary Public, via Zoom Video
Communications, on Wednesday, May 31, 2023,
commencing at 9:57 a.m.

- - -

ERSA COURT REPORTERS
30 South 17th Street
United Plaza - Suite 1520
Philadelphia, Pennsylvania 19103
(215) 564-1233

CHRISTIAN WILBUR

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2 APPEARANCES:

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BY: JAMES J. FITZPATRICK, III, ESQUIRE

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CHRISTIAN WILBUR

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5

WITNESS

PAGE

6

CHRISTIAN WILBUR

7

8

By Mr. Jennings

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11

- - -

12

13

14

E X H I B I T S

15

16

NUMBER

DESCRIPTION

PAGE MARKED	PAGE ATTACHED
----------------	------------------

17

Wilbur-1

EEO-4 Data Collection

18

88

18

Wilbur-2

Certificate of
Attendance

19

89

19

Wilbur-3

Facebook Post

29

90

20

21

22

- - -

23

24

CHRISTIAN WILBUR

7

1 Q. Great.

2 I am not trying to confuse you with any of
3 my questions. If at any point during this
4 deposition you do not hear my question or do not
5 understand my question, please let me know and I
6 will repeat my question so that you hear it or try
7 to rephrase it in such a way that you can understand
8 it; however, if you don't tell me that you didn't
9 understand my question and you provide me with a
10 response, I'm going to have to assume that your
11 response is to the question in the form that I asked
12 it. Do you understand that?

13 A. Yes.

14 Q. You were just sworn in by the court
15 reporter. All your answers are given under oath and
16 subject to penalty of perjury just as if you were
17 testifying in court. Do you understand that?

18 A. Yes.

19 Q. Mr. Wilbur, are you under the influence of
20 any medication that would affect your memory, that
21 would prevent you from understanding my question or
22 to recall events?

23 A. No.

24 Q. Have you consumed any alcoholic beverages

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TOWNSHIP POLICE BENEVOLENT :
ASSOCIATION, CHRISTIAN WILBUR, :
ROBERT BAIADA, and CHRIS :
CALHOUN, : DEPOSITION UNDER

Plaintiffs, :

- vs - :

ORAL EXAMINATION

TOWNSHIP OF SPRINGFIELD, JAMES : OF
LEE, in his official capacity, :
BAIRD M. STANDISH, in his : CHRISTIAN WILBUR
official capacity, MICHAEL E. :
MAXWELL, in his official :
capacity, SUSANNA O. RATSAVONG, :
in her official capacity, PETER :
D. WILSON, in his official :
capacity, JONATHAN C. COBB, in :
his official capacity, EDDIE T. :
GRAHAM, in his official :
capacity, and A. MICHAEL TAYLOR :
in his official capacity, :

Defendants. :

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TRANSCRIPT OF DEPOSITION, taken by and
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Communications, on Wednesday, May 31, 2023,
commencing at 11:52 a.m.

- - -

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CHRISTIAN WILBUR

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5

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PAGE

6

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7

8

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11

- - -

12

13

14

E X H I B I T S

15

16

NUMBER

DESCRIPTION

PAGE MARKED	PAGE ATTACHED
----------------	------------------

17

PBA-1

Emails

7

45

18

PBA-2

Perceptions of Police-
Community Relations

7

46

19

PBA-3

Complaint

31

47

20

21

22

- - -

23

24

CHRISTIAN WILBUR

36

1 Q. And that was unsolicited, correct?

2 A. Correct.

3 Q. Was a vote ever taken on whether or not to
4 adopt any of those logos?

5 A. I don't believe so.

6 Q. Does the PBA have any agreement with its
7 current attorneys regarding the payment of
8 attorneys' fees in this case?

9 A. No.

10 Q. Has the PBA received any bills for
11 services rendered by attorneys in this case?

12 A. No.

13 Q. Do you personally have any agreement with
14 any attorney regarding payment of legal fees in this
15 case?

16 A. No.

17 Q. Chris Calhoun testified that he was
18 introduced to your attorney, current attorneys, by
19 you. How did you become aware of Mr. Zimolong and
20 Mr. Fitzpatrick?

21 A. Mr. Fitzpatrick reached out by phone.

22 Q. And that was an unsolicited conversation,
23 unsolicited communication?

24 A. Yes.

CHRISTIAN WILBUR

37

1 Q. And when was that unsolicited
2 communication?

3 A. I would say early 2023.

4 Q. Okay. I wanted to clear one thing up from
5 Mr. Calhoun's deposition. He testified regarding a
6 banner that the PBA had sponsored at the Little
7 League and softball leagues. Did you read that
8 testimony?

9 A. Yes.

10 Q. Was there a time when the leagues
11 expressed to the PBA some concern about the
12 continued display of those banners?

13 A. Not that I recall.

14 Q. Do you know if those banners were ever
15 removed?

16 A. I believe the Little League softball was
17 moved, but not removed.

18 Q. Do you know where it was moved?

19 A. No, I don't.

20 Q. Did anyone tell you why it was moved?

21 A. No.

22 Q. Do you know when it was moved?

23 A. No.

24 Q. So to the best of your knowledge, the